

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re Dealer Management Systems Antitrust
Litigation, MDL 2817*

This document relates to:

*Motor Vehicle Software Corp. v. CDK Global,
LLC, et al., Case No. 1:18-cv-00865 (N.D. Ill.)*

No. 1:18-CV-864

Hon. Robert M. Dow, Jr.

Magistrate Judge Jeffrey T. Gilbert

DECLARATION OF DANIEL L. RUBINFELD

I, Daniel L. Rubinfeld, declare as follows:

1. I am the Robert L. Bridges Professor of Law and Professor of Economics

Emeritus at the University of California, Berkeley and Professor of Law at New York University.

I am over 21 years of age and competent to make this declaration. The factual statements in this declaration are true and correct and are within my personal knowledge.

2. I was retained by counsel for The Reynolds and Reynolds Company (“Reynolds”)

to provide expert analysis and opinions in connection with the above-captioned matter.

3. My expert report in response to Plaintiff Motor Vehicle Software Corporation’s

(“MVSC”) Damages Claims, dated November 15, 2019, a true and correct copy of which is

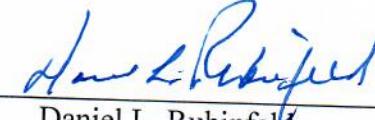
attached as **Exhibit A** to this declaration (“Rubinfeld Rebuttal Rpt.”), sets out my analysis, opinions, and conclusions with respect to the above-captioned matter.

4. The content of my report is true and correct and is within my personal knowledge.

5. My report sets out the testimony that I intend to offer if called to testify at trial.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 19th day of May, 2020, in Oakland, California.



Daniel L. Rubinfeld

CERTIFICATE OF SERVICE

I, Leo D. Caseria, an attorney, hereby certify that on May 20, 2020, I caused a true and correct copy of the foregoing **DECLARATION OF DANIEL L. RUBINFELD** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Leo D. Caseria

Leo D. Caseria
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